

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MARVIN A. EATON, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff(s),

v.

EDAP TMS S.A., MARC
OCZACHOWSKI, and ERIC SOYER,

Defendants.

RONNIE HADDAD, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff(s),

v.

EDAP TMS S.A., MARC
OCZACHOWSKI, and ERIC SOYER,

Defendants.

: Case No. 1:14-cv-06069-LGS

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: Case No. 1:14-cv-06188-LGS

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**DECLARATION OF JEREMY A. LIEBERMAN IN SUPPORT OF THE MOTION
BY RYAN H. TENNEBAR FOR CONSOLIDATION,
APPOINTMENT AS LEAD PLAINTIFF, AND APPROVAL OF COUNSEL**

I, Jeremy A. Lieberman, declare:

1. I am an attorney with the law firm of Pomerantz LLP [Proposed] Lead Counsel in the above-captioned actions (the “Related Actions”) and have personal knowledge of the facts set forth herein. I make this Declaration in support of the motion of Ryan H. Tennebar (“Tennebar”) for Consolidation, Appointment as Lead Plaintiff, and approval of Counsel.

3. Attached hereto as Exhibit A is a true and correct copy of the press release published over *GLOBE NEWSWIRE* in the first-filed action on August 4, 2014.

4. Attached hereto as Exhibit B is a true and correct copy of the Certification executed by Tennebar in the Related Actions.

5. Attached hereto as Exhibit C is a true and correct copy of the chart detailing Tennebar’s losses in the Related Actions.

6. Attached hereto as Exhibit D is a true and correct copy of the firm resume for Pomerantz LLP.

I declare under penalty of perjury under the laws of the United States of America that the foregoing facts are true and correct.

Executed this 3rd day of October, 2014, in New York, New York.

/s /Jeremy A. Lieberman
Jeremy A. Lieberman